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ExxonMobil
Chemical

December 21, 2004

Michael Leavitt, Administrator
U.S. Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
Attn: Chemical Right-to-Know Program

Email: oppt.ncic@epa.gov, chem.rtk@epa.gov

Re: High Production Volume (HPV) Chemical Challenge Program
ExxonMobil Chemical Company Registration Number

Dear Administrator Leavitt:

ExxonMobil Chemical Company (EMCC) has previously communicated to the U.S. EPA our company's agreement to participate in the High Production Volume (HPV) Chemical Challenge Program (Program). By copy of this letter, EMCC is confirming its commitment under the HPV Program to the two substances listed below.

CAS#	Chemical Name
100-40-3	Cyclohexene, 4-ethenyl
108083-43-8	Gases, petroleum, extractive, C4-6, isopentane-rich, reaction products with methanol, byproducts

To fulfill commitments to both the U.S. and Organization for Economic Co-operation and Development (OECD) SIDS (Screening Information Data Set) programs for HPV chemicals, EMCC continues to work on submissions for which it has sole responsibility, as well as participating in the following consortia:

- American Chemistry Council (ACC), Aliphatic Esters Panel
- ACC, Health, Environmental and Regulatory Task Group (HERTG)
- ACC, Higher Olefins Panel
- ACC, Olefins Panel HPV Work group
- ACC, Phthalic Anhydride Producers Task Group (PAPTG)
- ACC, Phthalate Esters (PE) Panel HPV Testing Group
- Ethylidene Norbornene Consortium
- International Hydrocarbon Solvent Consortium (IHSC)
- Lesser Ketones Manufacturing Association
- European Chemical Industry Council (CEFIC), Lower Olefins Sector Group
- CEFIC, European Council for Plasticizers and Intermediates

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EMCC is currently active in several submissions that were reviewed at the SIAM (SIDS Initial Assessment Meeting) 19 in October 2004, including finalizing the Higher Molecular Weight Phthalate Esters Category, Butenes Category, and 2-Methyl-2-Butene submission documents. EMCC is also supporting the preparation of SIAM 20 (scheduled for April 2005) documents for the Oxo Alcohol Category, Jayflex 77, and Isoprene submissions. EMCC continues to meet its commitments to the U.S. HPV Program and is currently preparing category analysis documents for the Alkyl Acetate C6 - C13 Category and Alkyl Alcohols C6 - C13 Category, and will be preparing similar documents for the Neoacids C5-C28 Category and Olefin Hydroformulation Products Category.

EMCC is aware that test plans and robust summaries for the two substances listed above are due by year end 2004. It continues to be the intention of EMCC to submit these documents as soon as resources permit. With regard to cyclohexene, 4-ethenyl, EMCC is working with other producers to form a consortium.

Please contact me if you require any further information on the status of EMCC commitments to the U.S. HPV Chemical Challenge Program.

Sincerely,

Nigel J. Sarginson
Product Stewardship & Regulatory Affairs Manager

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C:

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